

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SABRE, INC., et al.,

V.

NORTHWEST AIRLINES, INC.,

Case Pending in the Northern District of Texas,  
Fort Worth Division, Civil No. 4:04-CV-612-Y,  
Consolidated with 4:04-CV-907-Y (ECF)

Misc. No. 05-MC-00166 (SLR)

**JOINT MOTION OF NORTHWEST AIRLINES, INC. AND  
GALILEO INTERNATIONAL, INC. TO STAY  
OR ADMINISTRATIVELY CLOSE THIS MATTER**

Northwest Airlines, Inc. (“Northwest”) and Galileo International, Inc. (“Galileo”) respectfully request that the Court stay or administratively close the above-captioned matter. As grounds for this motion, Northwest and Galileo state as follows:

1. Northwest filed this matter to enforce a subpoena *duces tecum* that it served on Galileo in connection with its claims in consolidated litigation captioned *Sabre Inc., et al. v. Northwest Airlines, Inc.*, Civil Action No. 4:04-CV-612-Y (N.D. Tex.) (hereinafter, the “Underlying Litigation”). Galileo subsequently filed its cross Motion to Quash Document Subpoena.

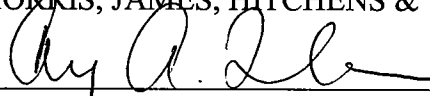
2. Northwest has filed a voluntary petition under Chapter 11 of the United States Code in the Southern District of New York, Case No. 17930 (ALG).

3. Because of Northwest's bankruptcy filing, the Honorable Terry R. Means, the judge presiding over the Underlying Litigation in the Northern District of Texas, has issued an order staying the Underlying Litigation and administratively closing it for the time being. A copy of that Order is attached hereto as Exhibit A. Judge Means' order further provides that "[t]he case may be reopened, without prejudice, upon the motion of either party, pursuant to any

action taken in the related bankruptcy proceeding. The right to reopen this case shall continue until thirty (30) days after the related bankruptcy proceedings are concluded.”

WHEREFORE, because of the stay issued by the Court in the Underlying Litigation, Northwest and Galileo request that the Court issue an Order in the form attached hereto (a) staying further proceedings in the above-captioned matter (and to the extent the Court may deem it necessary, administratively closing the matter), and (b) permitting Northwest to reopen this matter, without prejudice, if and when the Court in the Underlying Litigation lifts the stay and permits the Underlying Litigation to proceed.

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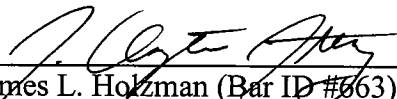
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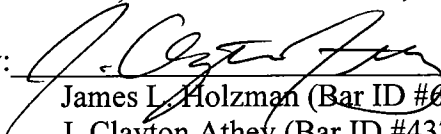
DATED: September 29, 2005

**CERTIFICATE OF SERVICE**

I, J. Clayton Athey, hereby certify that on September 29, 2005, I electronically filed **Joint Motion of Northwest Airlines, Inc. and Galileo International Inc. to Stay or Administratively Close this Matter** with the Clerk of the Court using CM/ECF, which is available for viewing and downloading, and which will send notification of such filing to the following counsel of record:

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